



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 15, 2023

BY ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
New York, New York 10007

Re: *Jose Ismael Ventura v. United States, 18 Cv. 9179 (JGK)*
Kevin Ventura v. United States, 20 Cv. 8064 (JGK)

Dear Judge Koeltl:

An evidentiary hearing is presently scheduled in the above-captioned matters on March 22, 2023. The parties write jointly to respectfully request an adjournment of the hearing. Petitioners' counsel recently identified Scott Barbour as a witness whom they would like to call to testify at the hearing. Barbour is presently incarcerated at USP Beaumont, and the Government has requested that Barbour be moved to this District for the hearing, which will take at least several weeks.

Accordingly, the parties respectfully jointly request that the Court adjourn the hearing to allow for Barbour's transfer to this District. In the months of May and June 2023, the parties, Government witnesses, and Ms. Cruz and her counsel are available for the hearing on the morning of Friday, June 16.

*ADJOURNED TO FRIDAY,
JUNE 29, 2023, AT 10:30AM.
SO ORDERED.*

John Koeltl
3/15/23 ✓ S O J

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By:

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cc: Richard Ma, Esq. (*counsel for Jose Ismael Ventura*) (by email)
David J. Cohen, Esq. (*counsel for Kevin Ventura*) (by email)